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December 9, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007
(212) 805-0288

Mark A. Kirsch
Partner
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Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC*, No. 20 Civ. 3773 (LGS) (S.D.N.Y.)

Dear Judge Schofield:

Pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020, Dkt. No. 51 (“Confidentiality Order”) (which incorporates the Court’s Individual Rule I.D.3), I write respectfully on behalf of Defendants to request leave to file under seal (i) Defendants’ Memorandum of Law in Opposition to Plaintiff’s Motion *in Limine* No. 7 (the “Motion”); and (ii) Exhibits A-B and D-G to the Declaration of Mark A. Kirsch in Opposition to Plaintiff’s Motions *in Limine* (the “Exhibits”). The Motion and Exhibits contain Confidential Information or Discovery Material as defined in the Confidentiality Order, including excerpts of deposition testimony and documents produced by both parties in this case. Parties and attorneys of record who should have access to the sealed documents are listed in Appendix A.

Pursuant to Paragraph I.D.3 of the Court’s Individual Rules, Defendants note that they are not the parties “with an interest in confidential treatment” of information contained in Exhibits B and D-G. Absent objection by Plaintiff, Defendants would not oppose filing these exhibits on the public docket without redactions.

Respectfully,

/s/ Mark A. Kirsch

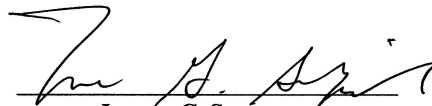
Mark A. Kirsch

Cc: All counsel of record (via ECF)

If Plaintiff seeks to maintain under seal any of the documents addressed above, it shall file a letter motion stating the grounds for sealing by **January 5, 2023**, and otherwise the documents may be made public. Plaintiff’s letter shall address, if applicable, why any documents should be filed entirely under seal rather than redacted.

So Ordered.

Dated: January 3, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Dr. Purnendu Chatterjee

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Randy M. Mastro

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Mark E. McDonald